

STATEMENT OF BASIS (AI No. 13478)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0098698 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Milbar Hydro-Test
P.O. Box 7701
Shreveport, LA 71137-7701

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Maxon Graham

DATE PREPARED: 14 November 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LPDES permit effective date: June 1, 2003
LPDES permit expiration date: May 30, 2008

D. Date Application Received: 25 October 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - oilfield service facility**

This is an existing facility that performs hydrostatic testing in the field. This site has the company offices and cleaning and washing of pipeline pressure testing equipment and trucks is also performed.

Process wastewater is discharged from the washdown racks where the equipment and vehicles are cleaned. The water goes through a settling tank and an oil/water separator before it is discharged. Sanitary discharges from this facility are routed to the City of Shreveport POTW and stormwater discharges are covered through a SWPPP.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 1389

C. LOCATION - 651 Aero Drive, Shreveport, Caddo Parish
Latitude 32 31' 43", Longitude 93 45' 58"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: exterior vehicle and equipment washwater
 Treatment: settling tank, oil/water separator
 Location: at the point of discharge from the oil/water separator prior to mixing with other waters
 Flow: variable, estimated flow of 250 gpd
 Discharge Route: local drainage to Cross Bayou

1. RECEIVING WATERS

STREAM - local drainage to Cross Bayou

BASIN AND SEGMENT - Red River Basin, Segment 100304

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 d. drinking water supply
 f. agriculture

* Drinking Water Supply is listed as a designated use of subsegment 100304 (Twelve Mile Bayou - From headwaters to Red River). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody per LAC 33:IX.1111.D.

5. TMDL STATUS

Subsegment 100304, Twelve Mile Bayou - From headwaters to Red River, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

CHANGES -- visible sheen parameter will be added to the permit based on the Exterior Vehicle wash General Permit (LAG750000) and all parameters shall be monitored monthly due to excursions during the previous permit monitoring period.

7. COMPLIANCE HISTORY/COMMENTS

A. WQMD - WE-L-07-0281 - A file review was performed for this facility and a Warning letter sent due to failure to meet effluent limitations, reporting under the incorrect permit number, and failure to have a correct signature on the DMR report.

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B. DMR Review/Excursions --

Date	Parameter	Outfall	Reported Value	Permit Limits
01/01-03/31/2007	TSS	001	120	45
01/01-03/31/2007	Oil and Grease	001	26	15
0701/-09/30/2006	Oil and Grease	001	18.9	15
04/01-06/30/2006	COD	001	604	200
04/01-06/30/2006	Oil and Grease	001	51.8	15
01/01-03/31/2006	TSS	001	90	45
01/01-03/31/2006	COD	001	922	200
01/01-03/31/2005	COD	001	2510	200
01/01-03/31/2005	Oil and Grease	001	144.7	15
01/01-03/31/2005	TSS	001	75.8	30
10/01-12/31/2004	TSS	001	100	30
10/01-12/31/2004	COD	001	5090	200
01/01-03/30/2004	COD	001	324	200
01/01-03/30/2004	Oil and Grease	001	21.8	15
10/01-12/31/2003	COD	001	476	200
10/01-12/31/2003	Oil and Grease	001	55.7	15
10/01-12/31/2003	TSS	001	31.7	30

There were no DMRs on file for the periods of April to September 2007, April to September 2005, and July to September 2003. Visible sheen parameter has been added to the permit and the monitoring frequency has been increased to monthly based on the compliance history of the facility.

8. **EXISTING EFFLUENT LIMITS – Outfall 001 – vehicle and equipment washdown wastewater (estimated flow is 200 gpd)**

Parameter	Limitation		Monitoring Frequency
	Monthly Average	Daily Maximum	
Flow	---	Report	Quarterly estimate
TSS	30 mg / L	45mg / L	quarterly
Oil and Grease	---	15 mg / L	quarterly
COD	200 mg / L	300 mg/L	quarterly
Soap and Detergents	---	Report	Quarterly inventory
pH – Allowable Range (su)	6.0 (min)	9.0 (max)	quarterly

9. **ENDANGERED SPECIES**

The receiving waterbody, Subsegment 100304 of the Red River Basin Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Milbar Hydro-Test

1. **Outfall 001** – Equipment washdown wastewater, estimated flow is 250 gpd

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	Previous permit; BPJ*; similar discharges
Soaps and/or Detergents	Report	N/A	Previous permit; BPJ*; similar discharges
pH – Allowable Range (s.u.)	6.0 (minimum)	9.0 (maximum)	Previous permit; BPJ*; similar discharges
TSS	30 mg/L	45 mg/L	Previous permit; BPJ*; similar discharges
COD	200 mg/L	300 mg/L	Previous permit; BPJ*; similar discharges
Oil and Grease	---	15 mg/L	Previous permit; BPJ*; similar discharges
Visible Sheen	No Presence	No Presence	BPJ*; similar discharges

Treatment: settling tank and oil/water separator

Monitoring Frequency: visible sheen shall be observed weekly and all other parameters monitored monthly

Limits Justification: previous permit limits and compliance history were taken into consideration for this permit

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 1389 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have equipment cleaning operations.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).